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Counsel for Plaintiff

*Counsel for Defendants Jeffery L. Taylor,
Don L. Taylor, L. John Lewis, S. Randall
Oveson, and Gannon Giguere, and for
Nominal Defendant Eco Science Solutions,
Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HANS MENOS, derivatively on behalf of
ECO SCIENCE SOLUTIONS, INC.,

Plaintiff,

v.

JEFFERY L. TAYLOR, DON L.
TAYLOR, L. JOHN LEWIS, S.
RANDALL OVESON, and GANNON
GIGUIERE,

Defendants,

and
ECO SCIENCE SOLUTIONS, INC.,
Nominal Defendant.

Case No. 3:17-CV-00662-LRH-CB

**STIPULATION OF VOLUNTARY
DISMISSAL WITHOUT PREJUDICE
AND [PROPOSED] ORDER**

Pursuant to Federal Rules of Civil Procedure 41(a) and 23.1(c) and LR 7-1, Plaintiff Hans Menos (“Plaintiff”), by and through his counsel the law firms of Levery & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A. and Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon Giguere (collectively, “Individual Defendants”) and Nominal Defendant Eco Science Solutions, Inc. (“Eco Science” and with Individual Defendants, “Defendants” and with Plaintiff, the “Parties”), by and through their counsel, the law firm of Greenberg Traurig, LLP, hereby stipulate and agree:

WHEREAS, Plaintiff commenced this action on November 3, 2017;

WHEREAS, Plaintiff filed the Verified First Amended Shareholder Derivative Complaint (“Amended Complaint”) on December 21, 2018;

WHEREAS, Defendants filed an answer to the Amended Complaint on September 13, 2019; and

WHEREAS, the claims alleged in this action on behalf of Eco Science are also being asserted in two other jurisdictions: (1) in the First District Court of Nevada, Carson City County styled as *Glorioso v. Taylor, et al.*, Case No. 17 OC 001371B; and (2) in the United States District Court for the District of Hawaii in the consolidated actions styled as *Bell v. Taylor, et al.*, Case No. 17-cv-00530 and *D’Annunzio v. Taylor, et al.*, Case No. 18-cv-00016;

NOW, THEREFORE, the Parties in this action stipulate and agree as follows:

1. This action is dismissed without prejudice.
2. Each Party is to bear its own costs and fees.
3. Notice of voluntary dismissal is not required under Fed. R. Civ. P. 23.1(c) because:
 - (i) there has been no settlement or compromise in the action; (ii) there has been no collusion among the Parties; (iii) neither Plaintiff nor his counsel have received or will receive, directly or indirectly, any consideration from Defendants for the dismissal; and (iv) the dismissal is without prejudice.

Respectfully submitted,

Dated: March 2, 2020

THE ROSEN LAW FIRM, P.A.

By: /s/ Erica L. Stone

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Erica L. Stone (*pro hac vice*)

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Don L. Taylor, L. John Lewis, S. Randall
Oveson, and Gannon Giguere, and for
Nominal Defendant Eco Science Solutions,
Inc.*

IT IS SO ORDERED:

UNITED STATES DISTRICT/MAGISTRATE JUDGE

DATED: _____